



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- :

INFORMATION

VLADIMIR SOLOVIEV, :

07 Cr.

**07 CRIM 729**

Defendant. :

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COUNT ONE

The United States Attorney charges:

1. From in or about 2004 up to and including in or about 2005, in the Southern District of New York and elsewhere, VLADIMIR SOLOVIEV, the defendant, and others known and unknown, unlawfully, willfully and knowingly engaged in the wholesale distribution in interstate commerce of prescription drugs, to wit, Viagra, without a state license.

(Title 21, United States Code, Sections 331(t), 333(a)(1), 353(e)(2)(A) & Title 18, United States Code, Section 2).

COUNT TWO

The United States Attorney further charges:

2. From on or about September 2, 2000, up to and including on or about March 28, 2005, in the Southern District of New York and elsewhere, VLADIMIR SOLOVIEV, the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, a scheme to

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cause Travelers Insurance Company (Travelers) to pay money to a medical clinic and cause Government Employees Insurance Company (GEICO) to pay money to SOLOVIEV based on a false claim of injury in an automobile accident occurring on or about September 2, 2000, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, a fax transmission of a police accident report on or about September 12, 2003 from Travelers to a law firm in New York County that represented Travelers in connection with the accident.

(Title 18, United States Code, Sections 1343 and 2.)

  
MICHAEL J. GARCIA  
United States Attorney